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11 **UNITED STATE DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 PEGGY A. ROLDAN,

14 Plaintiff,

15 vs.

16 TRANSUNION, LLC; BARCLAYS BANK,  
17 DELAWARE,

18 Defendants.

19 Case No.: 2:19-cv-01302-JCM-EJY

20

21 **STIPULATION AND [PROPOSED]**  
**ORDER TO EXTEND DEFENDANT**  
**BARCLAYS BANK DELAWARE'S**  
**TIME TO RESPOND TO COMPLAINT**  
**(FIRST REQUEST)**

22

23 This Stipulation to Extend Time to Respond to Complaint is made by and between  
24 Plaintiff Peggy A. Roldan (“Plaintiff”) and Defendant Barclays Bank Delaware (“Barclays”)  
25 through their respective counsel, in light of the following facts:

26

27 **RECITALS**

28 A. Plaintiff filed the Complaint (“Complaint”) against Barclays on or about July  
29, 2019.

30 B. Barclays was served with the Complaint on August 6, 2019.

31 C. Barclays’ current deadline to respond is August 27, 2019.

32 D. The parties agreed to extend Barclays’ time to respond to the Complaint through  
33 September 26, 2019, in order to give Barclays time to investigate Plaintiff’s claims and prepare  
34 a proper response, and for the parties to discuss a potential resolution of this matter.

35 E. There is good cause to grant this stipulation because Barclays requires additional  
36 time to investigate Plaintiff’s claims and prepare a proper response, and the parties require  
37 additional time to consider a resolution of this matter.

38 F. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and Barclays

1 respectfully request that the Court extend Barclays' time to respond to Plaintiff's Complaint  
2 through September 26, 2019.

3 **STIPULATION**

4 NOW, THEREFORE, Plaintiff and Barclays hereby stipulate and agree that Barclays  
5 has up to and including September 26, 2019, to file a response to Plaintiff's Complaint.

6 **IT IS SO STIPULATED**

7 DATED: August 27, 2019

LEWIS ROCA  
8 ROTHGERBER CHRISTIE LLP

9 By: /s/ J Christopher Jorgenson  
10 J Christopher Jorgensen  
11 *Attorneys for Defendant*  
*Barclays Bank Delaware*

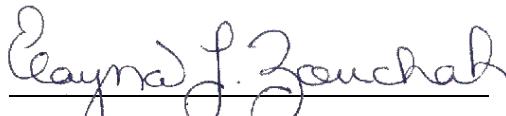
12 DATED: August 27, 2019

HAINES & KRIEGER, LLC

13 By: /s/ David H. Krieger  
14 David H. Krieger  
15 *Attorney for Plaintiff*  
*Michelle H. Pro*

17 **ORDER**

18 **IT IS SO ORDERED**

19   
20 \_\_\_\_\_  
21 United States Magistrate Judge

22 DATED August 27, 2019

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